Filed 01/05/26

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1	TO THE HONORABLE COURT:				
2	Plaintiff Jennie Quan and Defendants County of Los Angeles, Marisol Barajas,				
3	and Hector Vazquez, by and through their respective counsel of record, hereby				
4	submit their Joint Exhibit List pursuant to the Court's Order re: Jury/Court Trial.				
5					
6	DATED: January 5, 2026 LAW OFFICES OF DALE K. GALIPO				
7					
8	By /s/ Hang D. Le				
9	Dale K. Galipo				
10	Hang D. Le Attorneys for Plaintiff				
11	Auomeys for Flamum				
12					
13					
14	DATED: January 5, 2026 HURRELL CANTRALL LLP				
15					
16					
17	By/s/ Jerad J. Miller* Thomas C. Hurrell				
18	Janet J. Hur				
19	Jerad J. Miller Attorneys for Defendant, County of Los				
20	Angeles				
21					
22	*The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose				
23	behalf the filing is submitted, concur with the filing's content and have authorized the				
24	filing.				
25					
26					
27					
28					
	2 2:24-cv-04805-MCS-KS  JOINT EXHIBIT LIST				

### **PLAINTIFF'S EXHIBITS**

2	Exhibit Number	Description	<b>Objection and Reasons</b>	Date Identified	Date Admitted
3	Number			laenunea	Aumitteu
4	1	Bodyworn Camera Video of Hector			
5		Vazquez (COLA			
6		00855)			
7	2	Bodyworn Camera			
8		Video of Marisol Barajas (COLA			
9		00854)			
10	3	Synced video of	Defendants' objections:		
11		shots from Vazquez and Barajas's BWCs	Fed. R. Evid. 901, 403,		
12		Jan San San San San San San San San San S	801; lacks foundation; relevance; hearsay		
13			-		
14	4	Synced and stabilized video of shots from	Defendants' objections:		
15		Vazquez and	Fed. R. Evid. 901, 403,		
16		Barajas's BWCs	801; lacks foundation; relevance; hearsay		
17	5	Synced video of	Defendants' objections:		
18		Vazquez and Barajas's BWCs	Fed. R. Evid. 901, 403,		
19		Darajas S D W CS	801; lacks foundation;		
20			relevance; hearsay		
21	6	Synced and stabilized	Defendants' objections:		
22		video of Vazquez and Barajas's BWCs	Fed. R. Evid. 901, 403,		
23		-	801; lacks foundation; relevance; hearsay		
24					
25	7	Frame-by-frame of synced video of shots	Defendants' objections:		
26		from Vazquez and	Fed. R. Evid. 901, 403,		
27		Barajas's BWCs	801; lacks foundation; relevance; hearsay		
28					

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Exhibit Number	Description	Objection and Reasons	Date Identified	Date Admitted
8	Frame-by-frame of synced video of Vazquez and Barajas's BWCs	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
9	Frame-by-frame of synced and stabilized video of Vazquez and Barajas's BWCs	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
10	Synced video of Vazquez and Barajas's BWCs, with audio sourced from Vazquez's BWC	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
11	Synced video of shots from Vazquez and Barajas's BWCs, with audio sourced from Vazquez's BWC	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
12	Synced and stabilized video of shots from Vazquez and Barajas's BWCs, with audio from Vazquez's BWC	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
13	Synced video of Vazquez and Barajas's BWCs, with audio sourced from Barajas's BWC	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		

Exhibit Number	Description	Objection and Reasons	Date Identified	Date Admitted
14	Synced video of shots from Vazquez and Barajas's BWCs, with audio sourced from Vazquez's BWC	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
15	Synced and stabilized video of shots from Vazquez and Barajas's BWCs, with audio from Barajas's BWC	Defendants' objections: Fed. R. Evid. 901, 403, 801; lacks foundation; relevance; hearsay		
16	Bodyworn Camera Video from Deputy German Perez (COLA 00856)			
17	Bodyworn Camera Video from Deputy Chad Holland (COLA 00857)			
18	Bodyworn Camera Video from Deputy Kyle Toves (COLA 00858)			
19	Bodyworn Camera Video from Deputy Sotelo, J. (COLA 00859)			
20	Bodyworn Camera Video from Deputy Carlos De La Torres (COLA 00882)			
	14 15 16 17 18	Number  14 Synced video of shots from Vazquez and Barajas's BWCs, with audio sourced from Vazquez's BWC  15 Synced and stabilized video of shots from Vazquez and Barajas's BWCs, with audio from Barajas's BWC  16 Bodyworn Camera Video from Deputy German Perez (COLA 00856)  17 Bodyworn Camera Video from Deputy Chad Holland (COLA 00857)  18 Bodyworn Camera Video from Deputy Kyle Toves (COLA 00858)  19 Bodyworn Camera Video from Deputy Sotelo, J. (COLA 00859)  20 Bodyworn Camera Video from Deputy Carlos De La Torres	Number  14 Synced video of shots from Vazquez and Barajas's BWCs, with audio sourced from Vazquez's BWC  15 Synced and stabilized video of shots from Vazquez and Barajas's BWCs, with audio from Barajas's BWCs, with audio from Barajas's BWC  16 Bodyworn Camera Video from Deputy German Perez (COLA 00856)  17 Bodyworn Camera Video from Deputy Chad Holland (COLA 00857)  18 Bodyworn Camera Video from Deputy Kyle Toves (COLA 00858)  19 Bodyworn Camera Video from Deputy Sotelo, J. (COLA 00859)  20 Bodyworn Camera Video from Deputy Carlos De La Torres	Number   Synced video of shots from Vazquez and Barajas's BWCs, with audio sourced from Vazquez's BWC   Synced and stabilized video of shots from Vazquez and Barajas's BWCs, with audio from Vazquez and Barajas's BWCs, with audio from Barajas's BWC   Defendants' objections:    15

1	Exhibit Number	Description	<b>Objection and Reasons</b>	Date Identified	Date Admitted
2	21	Bodyworn Camera			
3	21	Video capturing			
4		ambulance			
5		transportation of Benjamin Chin to the			
6		hospital (COLA			
7		00853)			
8	22	Radio Traffic from			
9		Dispatch 6 (COLA			
10		00887) (ID Only)			
11	23	Radio Traffic from			
		Walnut L-Tac (COLA 00889)			
12	24	, ,			
13	24	Radio Traffic from Walnut Metro			
14		(COLA 00891)			
15	25	Audio Recording of			
16		Interview of Deputy			
17		Hector Vazquez (COLA 00752) (ID			
18		Only)			
19	26	Transcript of			
20	20	Interview of Deputy			
21		Hector Vazquez			
22		(COLA 01021- 01039) (ID Only)			
23	27	, , , , , , , , , , , , , , , , , , , ,			
24	27	Audio Recording of Interview of Deputy			
25		Marisol Barajas			
		(COLA 00755, 0756, 0757) (ID Only)			
26					
27					

1 2	Exhibit Number	Description	Objection and Reasons	Date Identified	Date Admitted
3	28	Transcript of Interview of Deputy			
$4 \parallel$		Marisol Barajas			
5		(COLA 00971- 00998) (ID Only)			
6 7	29	Audio Recording of			
8		Interview of Deputy Chad Holland			
9		(COLA 00748) (ID Only)			
10	30	Transcript of			
11	30	Interview of Deputy			
12		Chad Holland (COLA 00918-			
13		00931) (ID Only)			
14	31	Audio Recording of			
15		Interview of Deputy Christopher			
16		Bronowicki (COLA			
17		00749) (ID Only)			
18	32	Transcript of Interview of Deputy			
19 20		Christopher			
21		Bronowicki (COLA 1001-1016) (ID			
22		Only)			
23	33	Audio Recording of			
24		Interview of Deputy German Perez			
25		(COLA 00750) (ID			
26		Only)			
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1 2	Exhibit Number	Description	<b>Objection and Reasons</b>	Date Identified	Date Admitted
3	34	Transcript of Interview of Deputy			
4		German Perez			
5		(COLA 00932- 00952) (ID Only)			
6 7	35	Audio Recording of Interview of Deputy			
8		Kyle Toves (COLA			
9		00753) (ID Only)			
10	36	Transcript of Interview of Deputy			
11		Kyle Toves (COLA			
12 13		00955-00967) (ID Only)			
14	37	Audio Recording of			
15		Interview of Deputy Carlos De La Torres			
16		(COLA 00746) (ID Only)			
17	20	• ,			
18	38	Transcript of Interview of Deputy			
19		Carlos De La Tores (COLA 00901-			
20		00914) (ID Only)			
21	39	Photographs of			
22		Deputy Marisol			
23		Barajas after the incident (COLA			
24		00315-00321)			
25					

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1 2	Exhibit Number	Description	Objection and Reasons	Date Identified	Date Admitted
3	40	Los Angeles County	Defendants' objections:		
4		Fire Department Emergency Medical	Fed. R. Evid. 801;		
5		Services Record of Benjamin Chin	hearsay		
6	4.1		D.C. 1. (2.15.45		
7	41	Medical Records of Benjamin Chin from	Defendants' objections:		
8		Pomona Valley	Fed. R. Evid. 801; hearsay		
9		Hospital Medical Center (PLT 00273-	nearsay		
10		314)			
11	42	County of Los	Defendants' objections:		
12		Angeles Autopsy Report of Benjamin	Fed. R. Evid. 801;		
13		Chin (PLT 00002-	hearsay		
14		00034)			
15	43	Selected Autopsy  Photos of Paniamin	Defendants' objections:		
16		Photos of Benjamin Chin (PLT 00323	Fed. R. Evid. 403, 801;		
17		(redacted), 326, 328, 330, 380 (redacted),	relevance; hearsay; unduly prejudicial		
18		388, 389 (redacted),	a and firefrence		
19		390 (redacted), 392 (redacted), 394, 396,			
20		409 (redacted), 410			
21		(redacted)			
22	44	Cancelled Check	Defendants' objections:		
23		from Benjamin Chin to Jennie Quan (PLT	Fed. R. Evid. 403, 801;		
24		00037)	relevance; hearsay; unduly prejudicial		
25			undury prejudiciai		
26					

	Exhibit Number	Description	Objection and Reasons	Date Identified	Date Admitted
	45	Benjamin Chin	Defendants' objections:		
		Bachelor of Science Diploma from Cal	Fed. R. Evid. 403, 801;		
		Poly Pomona (PLT	relevance; hearsay;		
		00038-39)	unduly prejudicial		
	46	Photographs of	Defendants' objections:		
		Benjamin Chin and	Fed. R. Evid. 403;		
1		Benjamin Chin with Family (PLT 00040-	relevance; unduly		
		85)	prejudicial		
	47	Jennie Quan Kaiser	Defendants' objections:		
		Permanente Therapy	Fed. R. Evid. 403;		
		Records (PLT 00086- 00272)	relevance; unduly		
		, , , , , , , , , , , , , , , , , , , ,	prejudicial		
	48	BWC Still Shots			
		from Marisol Barajas Deposition			
	40	-			
	49	BWC Still Shots from Hector Vazquez			
		Deposition			
	50	Exhibits 50-100			
		reserved for Plaintiff			
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JOINT EXHIBIT LIST

### **DEFENDANTS' EXHIBITS**

1	<u>DEFENDANTS EXHIBITS</u>				
2	Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
4	101.	Incident Report (COLA 00006 –	Plaintiff's objections:		
5		00016)	Fed. R. Evid. 802,		
6		,	hearsay for which there		
			is no exception.		
7	102.	J. Sotelo	Plaintiff's objections:		
8		Supplemental Report	Fed. R. Evid. 802,		
9		(COLA 00017 – 00019)	hearsay for which there		
10		00017)	is no exception.		
11	103.	J. Segura	Plaintiff's objections:		
12		Supplemental Report (COLA 00020 –	Fed. R. Evid. 802,		
13		00022)	hearsay for which there		
14		,	is no exception.		
15	104.	S. Granados	Fed. R. Evid. 802,		
16		Supplemental Report	hearsay for which there		
		(COLA 00021 – 00023)	is no exception.		
17		,			
18	105.	Detective Han	Plaintiff's objections:		
19		(COLA 00024 – 00025)	Fed. R. Evid. 802,		
20		00020)	hearsay for which there		
$_{21}$			is no exception.		
22	106.	R. Suarez Jr.	Plaintiff's objections:		
23		Supplemental Report (COLA 00036 -	Fed. R. Evid. 802,		
		00037)	hearsay for which there		
24		,	is no exception.		
25					

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1 2	Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
3	107.	LASD Supplemental Report (COLA	Plaintiff's objections:		
4		00041 – 00075)	Fed. R. Evid. 802,		
5		,	hearsay for which there		
6			is no exception.		
	108.	Witness Interview	Plaintiff's objections:		
7		Summaries (COLA 00076 – 00079)	Fed. R. Evid. 402, 403;		
8		00070 00075)	not relevant;		
9			prejudicial/confusion if relevant; Fed. R. Evid.		
10			802, hearsay for which		
11			there is no exception.		
12	109.	Prior Mental Health	Plaintiff's objections:		
13		Incidents (COLA 00080 – 00082)	Fed. R. Evid. 402, 403;		
14		00080 - 00082)	not relevant;		
15			prejudicial/confusion if relevant; Fed. R. Evid.		
16			802, hearsay for which		
17			there is no exception.		
18	110.	Benjamin Chin	Plaintiff's objections:		
		DMV Report	Fed. R. Evid. 402, 403;		
19		(COLA 00088 – 00104)	not relevant;		
20		00104)	prejudicial/confusion if		
21			relevant; Fed. R. Evid.		
22			802, hearsay for which there is no exception.		
23			1		

1 2	Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
3	111.	Examination of	Plaintiff's objections:		
4		Evidence (COLA 00107 – 00141)	Fed. R. Evid. 402, 403;		
5			not relevant; prejudicial/confusion if		
6			relevant; Fed. R. Evid.		
7			802, hearsay for which there is no exception.		
8	112.	March 7, 2019	Plaintiff's objections:		
9		Incident & Supplemental Report	Fed. R. Evid. 402, 403;		
10		(COLA 00142 –	not relevant; prejudicial/confusion if		
11		00154)	relevant; Fed. R. Evid.		
12			802, hearsay for which		
13			there is no exception.		
14	113.	Benjamin Chin's	Plaintiff's objections:		
15		Restraining Order (COLA 00155 –	Fed. R. Evid. 402, 403;		
16		00193)	not relevant; prejudicial/confusion if		
17			relevant; Fed. R. Evid.		
18			802, hearsay for which		
19			there is no exception.		
20	114.	June 17, 2023 Incident Report	Plaintiff's objections:		
21		(COLA 00201 –	Fed. R. Evid. 402, 403;		
22		00210)	not relevant; prejudicial/confusion if		
23			relevant; Fed. R. Evid.		
24			802, hearsay for which		
25			there is no exception.		

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$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$	Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
3	115.	Vergel Sandifer	Plaintiff's objections:		
$\begin{bmatrix} 3 \\ 4 \end{bmatrix}$		Audio Interview (COLA 00745)	Fed. R. Evid. 402, 403;		
		(COLA 00743)	not relevant;		
5			prejudicial/confusion if		
6			relevant; Fed. R. Evid. 802, hearsay for which		
7    3			there is no exception.		
	116.	Syed Razvi Audio	Plaintiff's objections:		
		Interview (COLA 00744)	Fed. R. Evid. 402, 403;		
		00744)	not relevant;		
			prejudicial/confusion if		
			relevant; Fed. R. Evid. 802, hearsay for which		
			there is no exception.		
	117.	Janet Johansen	Plaintiff's objections:		
		Audio Interview (COLA 00742)	Fed. R. Evid. 402, 403;		
		(COLA 00742)	not relevant;		
			prejudicial/confusion if		
			relevant; Fed. R. Evid. 802, hearsay for which		
			there is no exception.		
	118.	Brandon Wiseman	Plaintiff's objections:		
		Audio Interview (COLA 00741)	Fed. R. Evid. 402, 403;		
		(002100741)	not relevant;		
			prejudicial/confusion if relevant; Fed. R. Evid.		
			802, hearsay for which		
			there is no exception.		
	119.	Marisol Barajas			
		Body-Worn Camera			
		(COLA 00854)			

1	Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
2 3 4	120.	Hector Vazquez Body-Worn Camera (COLA 00855)			
5 6 7	121.	German Perez Body- Worn Camera (COLA 00856)			
8 9	122.	Chad Holland Body- Worn Camera (COLA 00857)			
10 11 12	123.	Kyle Toves Body- Worn Camera (COLA 00858)			
13 14	124.	J. Sotelo Body-Worn Camera (COLA 00859)			
15 16 17 18	125.	Christopher De La Torre Body-Worn Camera (COLA 00882)			
19 20 21 22	126.	Body-Worn Camera of Plaintiff's Treatment After Stabbing (COLA 00291)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion if relevant.		
23 24 25 26 27	127.	Video of Benjamin Chin Stabbing Plaintiff (COLA 00818)	Plaintiff's objections: Fed. R. Evid. 402, 403; not relevant; prejudicial/confusion/w aste of time if relevant.		

1	Exhibit	Description	Objections and	Date	Date
2	Number		Reasons	Identified	Admitted
3	128.	Benjamin Chin Lifting Rifle in	Plaintiff's objections:		
4		Neighborhood	Fed. R. Evid. 402, 403;		
5		(COLA 00835)	not relevant; prejudicial/confusion/w		
6			aste of time if relevant.		
7	129.	Benjamin Chin	Plaintiff's objections:		
8		Walking Around Neighborhood	Fed. R. Evid. 402, 403;		
9		(COLA 00758;	not relevant; prejudicial/confusion/w		
10		00832 - 00833)	aste of time if relevant.		
11	130.	Hospital Body-Worn	Plaintiff's objections:		
12		Camera (COLA 00294; 00297 –	Fed. R. Evid. 402, 403;		
13		00298; COLA 00300	not relevant; prejudicial/confusion/w		
14   15		- 00303)	aste of time if relevant.		
16	131.	LASD Policies	Plaintiff's objections:		
17		(COLA 00328 – 00479)	Fed. R. Evid. 402, 403;		
18		, , ,	not relevant; prejudicial/confusion if		
19			relevant; Fed. R. Evid.		
20			802, hearsay for which there is no exception.		
21	122	Daniamin Chin			
22	132.	Benjamin Chin Journal/Documentar	Plaintiff's objections:		
23		y Evidence (COLA	Fed. R. Evid. 402, 403; not relevant;		
24		00480 – 00740)	prejudicial/confusion/w		
25			aste of time if relevant; Fed. R. Evid. 802,		
26			hearsay for which there		
27			is no exception.		
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1 2	Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
3	133.	Witness and Deputy Audio Interviews	Plaintiff's objections:		
4		(COLA 00741 –	Fed. R. Evid. 403, cumulative, prejudicial;		
5		00835)	Fed. R. Evid. 802,		
6			hearsay for which there		
7			is no exception.		
8	134.	Dispatch Audio (COLA 00887 -	Plaintiff's objections:		
9		00888)	Fed. R. Evid. 802,		
			hearsay for which there		
10			is no exception.		
11	135.	L-TAC Audio	Plaintiff's objections:		
12		(COLA 00889 – 00890)	Fed. R. Evid. 802,		
13		(00090)	hearsay for which there		
14			is no exception.		
15	136.	Walnut Station	Plaintiff's objections:		
16		Audio (COLA 00891 – 00892)	Fed. R. Evid. 802,		
17		00071 00072)	hearsay for which there		
18			is no exception.		
19	137.	Dispatch, L-TAC	Plaintiff's objections:		
20		and Walnut Station Audio Details	Fed. R. Evid. 402, 403;		
21		(COLA 00893 –	not relevant;		
22		00900)	prejudicial/confusion/w aste of time if relevant;		
23			Fed. R. Evid. 802,		
24			hearsay for which there is no exception.		
25	138.	Hector Vazquez	Fed. R. Evid. 802,		
26		Interview Transcript	hearsay for which there		
27		(COLA 01021 – 01039)	is no exception.		
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$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$	Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
3	139.	Marisol Barajas Interview Transcript	Plaintiff's objections:		
$_{4}\Vert$		(COLA 00971 –	Fed. R. Evid. 802,		
5		00998)	hearsay for which there		
			is no exception.		
6	140.	Chad Holland	Plaintiff's objections:		
7		Interview Transcript	E 1 D E 11 000		
8		(COLA 00918 –	Fed. R. Evid. 802, hearsay for which there		
9		00931)	is no exception.		
			_		
10	141.	Christopher	Plaintiff's objections:		
11		Bronowicki Interview Transcript	Fed. R. Evid. 802,		
12		(COLA 1001 –	hearsay for which there		
13		1016)	is no exception.		
14	142.	Carlos De La Torre	Plaintiff's objections:		
15		Interview Transcript	Fed. R. Evid. 802,		
16		(COLA 00901 – 00914)	hearsay for which there		
		00714)	is no exception.		
17 18	143.	German Perez	Plaintiff's objections:		
		Interview Transcript	Fed. R. Evid. 802,		
19		(COLA 00932 – 00952)	hearsay for which there		
20		00932)	is no exception.		
21	144.	Kyle Toves	Plaintiff's objections:		
22		Interview Transcript	End D Evid 900		
23		(COLA 00953 –	Fed. R. Evid. 802, hearsay for which there		
24		00967)	is no exception.		
25	145.	Autopsy Report	Plaintiff's objections:		
26			Fed. R. Evid. 802,		
27			hearsay for which there		
28			is no exception.		
			10 2.2	1 av 04905 Ma	

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1 2	Exhibit Number	Description	Objections and Reasons	Date Identified	Date Admitted
3	146.	County of Los	Plaintiff's objections:		
4		Angeles Fire Department Records	Fed. R. Evid. 802,		
5		•	hearsay for which there is no exception.		
6	147.	Benjamin Chin's	Plaintiff's objections:		
7		Pomona Valley	Fed. R. Evid. 802,		
8		Hospital Records	hearsay for which there		
9			is no exception.		
10	148.	John Marehbian, MD Expert Report	Plaintiff's objections:		
11		MD Expert Report	Fed. R. Evid. 802,		
12			hearsay for which there is no exception.		
13	149.	Joel Suss Expert	Plaintiff's objections:		
14	147.	Report	Į ,		
15			Fed. R. Evid. 802, hearsay for which there		
16			is no exception.		
17	150.	Ed Flosi Expert	Plaintiff's objections:		
18		Report	Fed. R. Evid. 802,		
19 20			hearsay for which there is no exception.		
21	151	Damia Wasa 1 D	-		
22	151.	Parris Ward Expert Report and	Plaintiff's objections:		
23		Synchronized Videos	Fed. R. Evid. 802, hearsay for which there		
24		videos	is no exception.		
25					